

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION TO DISMISS**

Plaintiff VirtaMove (“Plaintiff”) and Defendant International Business Machines Corp. (“Defendant”) (altogether the “parties”) hereby jointly move for a three (3) day extension of time for Plaintiff to respond to Defendant’s Motion to Dismiss (Dkt. 229). Plaintiff’s deadline to respond to Defendant’s Motion is currently August 11, 2025. With this three-day extension, the deadline would be August 14, 2025.¹

¹ Defendant’s response will be due seven days after the proposed extended deadline of August 14, 2025, which is August 21, 2025.

This extension is necessary to ensure adequate time for Plaintiff to prepare its briefing. In particular, the attorney responsible for the issues raised in Defendant's Motion recently welcomed the birth of a first child. There have been no other extension requests related to Defendant's Motion.

Counsel for the parties have conferred and all parties agree to this request, which is supported by good cause as set forth above. Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

Dated: August 6, 2025

Respectfully submitted,

/s/ Christian W. Conkle

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*Attorneys for Defendant
International Business Machines Corp.*

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant, and this is a joint motion.

/s/ Christian W. Conkle

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via CM/ECF on August 6, 2025.

/s/ Christian W. Conkle